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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

GABRIEL SETH JOSEPH,		Case No. 2:19-cv-00140
Petitioner,		PETITIONER’S RESPONSE/NOTICE
		OF NON-OPPOSITION TO UNITED
vs.		STATES’ MOTION FOR RULE 6
		DISCOVERY AND COMPULSORY
UNITED STATES OF AMERICA,		ORDER
Respondent.		Judge Jill N. Parrish

Petitioner, through counsel, hereby responds the United States’ Motion for Rule 6 Discovery and Compulsory Order (the “Discovery Motion”).

Petitioner does not oppose the Respondent’s Discovery Motion per se but simply asks the Court to require, in any order issued, that the government’s inquiry and discovery, including questions to deponents, shall be strictly confined within the scope of the subjects of the attorney/client privilege waiver pursuant to this Court’s Memorandum Decision and Order Waiving Attorney-Client Privilege. (DKT. 9). Additionally, all affected parties should be

required to produce only the information and documents, etc. that are within the scope of the subjects of the waiver pursuant to this Court's Order.

Thus, deponents and other persons subject to the discovery order, should not be required to "answer all questions at the deposition," as the government has requested in their Proposed Order Granting United States Motion for Rule 6 Discovery and Compulsory Order, (DKT 10-1 ¶6), but instead need only answer appropriate questions and produce appropriate documents that are within the scope of the subjects of the waiver pursuant to this Court's Order.

Dated this 24th day of July 2019.

/s/ J. Morgan Philpot

J. Morgan Philpot, USB #11855
Attorney for Petitioner